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[□] United States Court of Appeals 2nd Circuit
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May 4, 2017

BY ECF

Honorable Naomi Reice Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Geovane Delgado v. The City of New York, et al.,
17 CV 2444 (NRB)

Your Honor:

This firm represents the Plaintiff, Geovane Delgado, in this matter. This letter is respectfully submitted further to Plaintiff's letter, dated May 3, 2016 (Docket No. 22), where Plaintiff requested that the Court direct the Defendants to provide, by May 12th, the names of the Deputy Warden for Administration of the Vernon C. Bain Complex at Rikers Island Correctional Facility from June 2014 through September 2014, and the Supervisor of the General Office of the Vernon C. Bain Complex at Rikers Island Correctional Facility from June 2014 through September 2014, named in the Complaint at John Does 1 and 2, respectively.

This request was made in response to Defendants' request for a 60-day extension of their time to Answer the Complaint (Docket No. 21). Yesterday evening, the Court emailed to counsel in this case, the endorsed Order granting Defendants' request for a 60-day extension of their time to Answer. There has been no Order issued on Plaintiff's request for the names of John Does 1 and 2. Due to the impending statute of limitations, Plaintiff respectfully requests a conference to discuss a deadline for the Defendants' disclosure of the Doe Defendants,¹ and/or an Order from the Court granting the undersigned counsel leave to contact Rikers Warden Charlton Lemon at CharltonLemon@nyc.doc.gov, and Florina Getman, Esq., counsel for the Legal Division of the New York City Department of Corrections, at 718-546-0974. The Defendants do not consent to this request.

¹ As noted in Plaintiff's May 3rd letter, counsel for the Defendants has told me that he asked his paralegal to obtain this information, but he won't provide a time frame within which he expects to disclose it.



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Upon information and belief, these individuals will be able to provide the names of the Doe Defendants in this case. Plaintiff seeks leave from the Court to contact these individuals in an abundance of caution because they are employees of the City of New York, a represented party in this action. Plaintiff is willing to copy defense counsel on any written communication with Ms. Getman and Mr. Lemon, should the Court grant this request. Plaintiff thanks the Court for its time and consideration.

Respectfully submitted,

/s/

JESSICA MASSIMI (JM-2920)

cc: Joseph Zangrilli (By ECF)